

From: [MCCLINCY Matt](#)
To: [DeMaria, Eva](#)
Cc: [LACEY David](#)
Subject: FW: EPA's Comments on Proposed SCD for Schnitzer Investment-Doane Lake Property
Date: Tuesday, July 19, 2016 1:08:36 PM
Attachments: [EPA comments-SIC Doane Lake Proposed SCD \(2-12-16\).pdf](#)

Hi Eva,

Below is a link to DEQ's revised and final source control decision for the Schnitzer Investment-Doane Lake Property. Our revised SCD addresses most all of your February 12, 2016 review comments on the Proposed-Source Control Decision DEQ provided to EPA on January 15, 2016. DEQ modified the document as shown below to address EPA's comments. For clarity each of EPA's comments are summarized and EPA's full comments are provided as an attachment to this email. Once you have completed your review, we request that EPA provide a letter confirming DEQ's SCD.

(b) (6)

General Comment 1-Based on current evidence, the stormwater pathway is not considered a contamination source to the river and EPA agrees that the implemented SCM at the site is adequate. EPA may reevaluate contingent on post-SCM inspections.

- **DEQ Response:** DEQ concurs with EPA.

General Comment 2: EPA determined there was a potential for stormwater discharge from the site. This issues has been adequately addressed by the SCM. EPA may reevaluate contingent on post-SCM inspections.

- **DEQ Response:** DEQ concurs with EPA.

General Comment 3: If post-SCM inspections indicate that stormwater is discharging from the site further characterizations would be needed.

- **DEQ Response:** DEQ concurs with EPA.

General Comment 4: A groundwater monitoring program to evaluate leaching from shredder residue should be implemented.

- **DEQ Response:** DEQ concurs that additional evaluation of groundwater contamination resulting from leaching of contaminants from groundwater would be needed before DEQ could issue a No Further Action determination for the site. A full Remedial Investigation/Feasibility Study and likely implementation of additional remedial actions addressing the source area would be necessary for a NFA, but DEQ concludes the site is adequately characterized for source control needs.

General Comment 5: To evaluate potential migration of groundwater contamination from the site, one or more monitoring wells should be installed and monitored at the downgradient property boundary.

- **DEQ Response:** A full evaluation of groundwater contamination at the site will be a necessary component of any Remedial Investigation/Feasibility Study prior to DEQ issuing a NFA for the site as noted above in DEQ's response to General Comment 4.

General Comment 6: The memorandum does not contain a figure that shows all of the SCM components (cap, stormwater management structures, and right-of-way excavations.) EPA recommends that a figure showing all of the SCM components be added to the memorandum to

document clearly the completed SCM.

- **DEQ Response:** Figure 4 from the Capping and Grading Plan presented in (Attachment 2 of the Final SCD) which shows the cap, stormwater management structures, and right-of-way excavations.

Specific Comment 1: The location of the shredder residue from the right-of-way excavation consolidation should be shown on as-built drawing.

- **DEQ Response:** Location of the shredder residue from the right-of-way excavation was not surveyed during placement. The shredder residue located in the right-of-way was from the same source as the material located on the Site and was placed at the same time. Also material excavated from the right-of-way was predominantly soil. The construction completion report described in detail the material excavated from the right-of-way area. Approximately 2,400 cubic yards of impacted soil was consolidated on the Site. Shredder Residue was typically observed in thin lenses of less than 1 ft in the upper 3 ft within the ROW. However, additional material was removed to 5 feet bgs to ensure compliance with the City Site Development Permit. The material removed from the ROW is substantially the same as the material present across the rest of the site so Schnitzer did not survey its location.

Specific Comment 2: The location where shredder residue was left in place within the ROW should be shown on the as-built drawings. This information may be needed to inform further source control evaluations or for institutional controls to protect future construction workers.

- **DEQ Response:** The location where shredder residue was left in place within the ROW was not surveyed. The construction completion report describes in detail the location of areas where shredder residue was left in place. The information presented in the completion report is readily available and can be used to inform further source control evaluation or for institutional controls to protect future construction workers. Consistent with the requirements of the City Site Development Permit, Schnitzer provided this information to the City to inform future workers.

Specific Comment 3: The as-build figures in Attachment A should show the location of the two stormwater rip rap energy dissipaters, stormwater swales and right-of-way excavation. The red notation indicating “installed Barrier” should be defined in the legend and explained in this memorandum.

- **DEQ Response:** The location of the two stormwater rip rap energy dissipaters, stormwater swales and right-of-way excavation are shown in Figure 2 of the Soil and Cap Management Plan. The red notations indicating “Installed Barrier” show where impermeable a contaminant barrier (60 mil visqueen) was installed consistent with the City’s utility corridor fill ordinance. City ordinance require an impermeable barrier be placed in areas where soil did not meet the definition of “utility corridor fill.” A detailed explanation is presented in the SCM completion report.

Specific Comment 4: A location map showing the location of the soil samples in Attachment B should be included.

- **DEQ Response:** The data presented in Attachment B of the Soil and Cap Management Plan is intended to present the concentration range of contamination in subsurface soils. The data were collected in 1995 as part of sampling directed by Schnitzer’s attorney not part of a DEQ investigation. Schnitzer provide a portion of the report so the data could be used to

show the range of contamination. This report is attached and as you can see it does not provide sufficient information to develop a location map.

Specific Comment 5: If ongoing performance monitoring indicates offsite migration of surface soil from the site, then future assessment should include verification sampling for all Portland Harbor COCs in the erodible areas of the import fill cap.

- **DEQ Response:** DEQ concurs with EPA.

Specific Comment 6: Stormwater swale and riprap energy dissipater condition are described but the attached as-built figures in the 2015 Annual Inspection Report do not show the location of these features.

- **DEQ Response:** The stormwater swale and riprap energy dissipater are shown in Figure 3 of the 2015 Annual Inspection Report.

From: DeMaria, Eva [<mailto:DeMaria.Eva@epa.gov>]

Sent: Wednesday, April 20, 2016 2:50 PM

To: LACEY David

Subject: RE: EPA's Comments on Proposed SCD for Schnitzer Investment-Doane Lake Property

Hi Dave-

This is agreeable. Thanks.

Eva

From: LACEY David [<mailto:LACEY.David@deq.state.or.us>]

Sent: Wednesday, March 30, 2016 4:06 PM

To: DeMaria, Eva <DeMaria.Eva@epa.gov>

Subject: EPA's Comments on Proposed SCD for Schnitzer Investment-Doane Lake Property

Hi Eva,

As a follow up to Matt's meeting with you and Davis Zhen, Matt asked me send an email on current status of the Schnitzer-Doane Lake Property (SIC-Doane Lake Property) in regards to EPA's comments on DEQ's proposed SCD. General Comments 4 and 5 of EPA's Feb. 12, 2016 review comments address data gaps associated with the potential Outfall 22B stormwater system preferential pathway. The proposed source control decision is not associated with a broader remedial action/No Further Action (NFA) determination for the site. Currently the site has only been investigated for source control. In the future the site will need to complete a full Remedial Investigation/Feasibility Study and likely implement additional remedial action addressing the source area before receiving an NFA from DEQ. Additional groundwater assessment will be part of this process. That being said, DEQ wants to confirm that EPA is OK with DEQ finalizing the SCD without specifically addressing general comments 4 and 5 in lieu of EPA revising their Feb. 12, 2016 comment letter.

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